

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

THE MIDDLE EAST FORUM, :  
: Plaintiff, :  
v. : Civil Action No.: 19-5697  
: LISA REYNOLDS-BARBOUNIS, :  
: Defendant. :  
:

**PLAINTIFF'S MOTION FOR CONTEMPT AND SANCTIONS FOR VIOLATION OF  
MULTIPLE COURT ORDERS, FOR UNLAWFUL DISCLOSURE OF TRADE  
SECRETS ON THE PUBLIC DOCKET, AND FOR FILING FALSE PLEADINGS WITH  
THIS COURT**

Plaintiff The Middle East Forum (“Plaintiff” or “MEF”), by counsel, moves this Court for contempt and sanctions against Defendant Lisa Barbounis (“Barbounis”) and her counsel, Seth D. Carson (“Mr. Carson” and collectively with Barbounis, the “Defendant”) pursuant to Fed. R. Civ. P. 37(b)(2), 28 U.S.C. § 1927, and Local Civil Rule 83.6.1 for violating multiple Court orders Court procedures, for the unlawful disclosure of MEF’s trade secrets on the public docket, and for filing false pleadings with this Court. In support of this Motion, Plaintiff submits the accompanying memorandum of points and authorities.

Based on its Motion and Memorandum, Plaintiff respectfully requests this Court enter an Order:

- (i) Granting MEF’s Motion;

- (ii) Finding Defendant in civil contempt for willfully submitting false statements to this Court and violating multiple Court orders, including the protective order (the “Protective Order”) entered in this case;
- (iii) Striking Defendant’s defenses, and entering a default judgment on liability against Barbounis;
- (iv) Ordering Barbounis and Mr. Carson to pay MEF’s attorneys’ fees and costs incurred as a result of this Motion; and
- (v) Granting such other relief as this Court deems proper.

Dated: October 11, 2021

THE MIDDLE EAST FORUM  
By counsel

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*Counsel for The Middle East Forum*

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 11, 2021, a true and correct copy of the foregoing was filed and served electronically on all parties through the Court's CM/ECF system.

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